WALATOWA

PUEBLO of JEMEZ

August 9, 2012

Dennis Trujillo
VCNP Executive Director
Valles Caldera National Preserve
P.O. Box 359
Jemez Springs, NM 87025

RE: Comment on the Draft EIS on Public Access and Use Plan

Dear Mr. Trujillo:

The Jemez people have been living in the Jemez Mountains since time immemorial and have established aboriginal Indian title to most areas within the Jemez Mountains, including the Valles Caldera National Preserve. The Spanish Conquistadors found us living in our homeland in the 1540's and misinterpreting our word "HEMISH" began referring to our ancestral homeland as the "JEMEZ" Mountains. The Jemez people were a strong and well established people numbering in the tens of thousands at the time of Spanish contact. We constructed 62 large villages, constructed hundreds of field houses and summer dwellings, built trails and shrines, and established resource procurement areas throughout the Jemez Mountains. No other people can more rightfully lay claim to the land and resources of the Jemez Mountains than Jemez tribal members whose ancestors built cities, hunted, gathered, were born, lived, died, and were buried in these mountains. Thousands of archeological sites marking the mesas, canyons, and springs in the Jemez Mountains are attributed to the Jemez people. An entire Jemez civilization flourished in these mountains until European contact. The descendants of this civilization, though much reduced in number, live on. The Jemez are adept farmers and hunters, whose food acquisition and storage techniques have sustained them all of these centuries in the same mountain location.

The Jemez people are speakers of the Towa language – a language completely unique in the world. No other people speak this language, except Pecos Pueblo whose tribal members joined the Jemez at Walatowa in 1838. Upwards of eighty percent of the existing 3,000 tribal members found at the village of Walatowa at the base of the Jemez Mountains speak this language fluently. It is our first language; taught in the home to toddlers who then learn English as they enter elementary school.

The Jemez lost their freedom to the Spanish and much of their land to Spanish, American and other European settlers. During the 20th century, large parcels of land that we retained throughout the earlier assaults were lost to Anglo squatters who exploited loopholes in federal law and lax government enforcement of tribal rights. In the first half of the 20th century the American government unlawfully appropriated large areas of

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Jemez ancestral Indian title lands for inclusion in national forests and Taylor grazing districts. A homeland that once covered at least one million acres now includes only 89,000 acres.

The Public Access and Use Plan proposed by the Valles Caldera Trust (hereinafter "VCT") affects our ties with what is now the Valles Caldera National Preserve (hereinafter "VCNP") and what was central to our ancestral domain. The Draft EIS presents six Alternatives for the development of facilities and infrastructure to provide increased access to and in the Valles Caldera National Preserve. Alternative 1 is the no-action alternative. With this no action plan the Valle Grande and Banco Bonito staging areas would be removed and the current interim recreation program would be eliminated. No facilities or new infrastructure would exist. The current visitor services would not be replaced, although visitors would still be able to hike the trails on Rabbit Mountain without a permit or fee. Spontaneous access to the Preserve would be limited. The VCT would continue to conduct fee-based tours and activities on a scheduled basis. Access for the grazing program would continue, but the VCT would not enter into any new agreements or grants. The current tribal access policy would continue. This alternative would have the most beneficial impacts to the resources from the decrease in human presence within the Preserve. The Pueblo would no longer be concerned about additional adverse impacts to their cultural resources or the natural resources in the procurement areas where medicinal plants and herbs as well as other important resources are collected by the Jemez People.

Alternatives 2 thru 4 would have the greatest negative impacts on Jemez Traditional Cultural Properties (hereinafter "TCPs") in the VCNP. As stated in the above paragraphs, the Jemez Mountains, including the VCNP, are within the Jemez ancestral domain to which Jemez Pueblo holds aboriginal Indian title. The Jemez People's most sacred religious and cultural locations, including former Pueblo sites where hundreds of our ancestors lived together; including field houses where seasonal farming and hunting was headquartered, shrines where prayers are offered, grave sites, and procurement locations where medicinal and culturally significant plants and minerals are sourced for a variety of personal spiritual and health uses; would all be threatened by ground disturbing activities involved with construction of a new visitor center, parking lots, campgrounds, picnic areas, road improvements and improvements on hiking trails for backpacking and horseback riding.

With the new proposed buildings and facilities in place there will be an increased demand for water. The proposal mentions that water usage to accommodate the increase in demand will increase anywhere from 2 million gallons to 4.4 million gallons a year. We live in the Southwest and the demand for water has greatly increased for the people living in the urban areas and the Jemez Valley below the Caldera. The Valles Caldera is the headwaters for the Jemez watershed. All of the water that Jemez Pueblo uses for their livelihood comes from this sacred area. In our time of drought, what kind of impact will this have on the availability of water for us who depend on this sacred water? The plan also talks about taking the water from the natural springs in the immediate landscape. Once the millions of gallons are pumped what will happen to our sacred springs in the Preserve that we use for our religious ceremonies? We oppose any further development of springs in the Valles Caldera to provide an increased human water supply.

Under alternative 2, the Trust proposes a small scale Visitor Contact Station in the Banco Bonito area in the southwestern part of the preserve. In addition, it mentions the development of a double lane road at certain locations to provide easier access into the Preserve. The VCT should understand that one of the most sacred pilgrimage trails from the village of Walatowa to Redondo Peak, our most important landmark in the

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Preserve, passes through the area where this Visitor Contact Station is proposed. In addition, there are important plant procurement areas within Banco Bonito. The trail and procurement areas have been in continual use by the Jemez People for approximately 800 years. This use is 758 years older than the National Environmental Policy Act that gives rise to the DEIS. Dozens of generations of Jemez tribal members have walked that trail and benefitted from the unique plants found in that location. Our tie to that location cannot be overstated.

There is also a small pueblo site and many agricultural features and fieldhouses that Jemez is claiming as their ancestral homeland. Research on the archaeological sites in this area has begun and so much more needs to be researched. It would be a travesty to overlook this rich archeological record and build new facilities that will cause an increase in human population in this area. This population will do what human populations do everywhere on public land: trample on, vandalize, loot, litter, and disrespect sacred places.

Alternatives 3A and 3B propose a 10,000 square Entrada del Valle Visitor Center which includes a full service visitor and interpretive center constructed immediately below State Road 4, southeast of South Mountain overlooking the Valle Grande. This area is a very special and sacred procurement area for one of the religious society groups from Jemez. Some of the archaeology found in this area is the result of this particular society group performing their ceremonies for hundreds of years in that very spot.

Alternatives 4A and 4B propose a Vista del Valle Visitor Center. This would be a 10,000 square feet building with a full service visitor and interpretive center constructed immediately above State Road 4, below Rabbit Mountain, overlooking the Valle Grande. This area again is a special and sacred procurement area for several religious society groups from Jemez. It has TCP's as well as archaeology that is a result of our society groups performing their ceremonies in this area since time immemorial.

Alternatives 2, 3B and 4B propose access into the Preserve via personal vehicles and/or shuttles. The primary mode of transportation would be personal vehicles. Shuttles would only be used for tours and group events or to reduce congestion on high-use days. Alternatives 3A and 4A propose primary access via shuttle system from the proposed full service visitor center near the Valle Grande to provide interpretive and other services to visitors. Access to the Preserve would be primarily by shuttle: personal vehicles would be allowed for specific activities by permit only. As I mentioned earlier, the mere fact of an increase in human presence, up to 120,000 a visitors a year, poses a threat to the ability of the Jemez People to continue to practice their religion in what is now the VNCP. Personal vehicle access for up to 120,000 visitors annually is unimaginable. The place would be a circus. It is hard enough on the wildlife right now with the vehicle flow into and out of the Preserve let alone approximately 300 vehicles a day in the Preserve. That is why the Pueblo recommends shuttle service only for access into and out of the Preserve. It is a trend some of the National Parks are following such as Zion, Yosemite, and Glacier National Parks, and it is working. It would have less of an impact on the resources in the Preserve.

There is mention in the EIS that if a shuttle transport system is chosen, in the future the VCNP shuttles will be changed from gasoline engines to electric engines. This is what Jemez would recommend as well to cause less of a carbon footprint from vehicle usage. The Pueblo also recommends that the shuttles follow the Level 4 loop route. It is on a road already in existence and would be easier to manage.

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We also recommend eliminating the proposed picnic areas and camp grounds in the Valle de San Antonio, Valle Toledo, and Obsidian Valley. These areas are special procurement areas. The Valle de San Antonio is a refuge area for the Bald Eagle in the winter time according to Terry Johnson, a wildlife biologist working on data collection on the Bald Eagle. There are proposed fishing and hunting access and parking lots at various locations along the creek in the Valle de San Antonio which will also impact Bald Eagle habitat. Controlling access for seasonal impacts would be best in these locations as well.

The Pueblo also recommends compost toilets, rain catchment systems and an efficient water system infrastructure to use less water. We feel the water usage for the proposed Visitor Center and other proposed facilities is unnecessarily high, especially at a time when our global climate is changing to a much hotter and drier climate. We feel that the Preserve could cut down on it's water usage with more efficient, "go green" water systems.

If the alternative is chosen to build a full service visitor and interpretive center, Jemez Pueblo proposes to offer our geographic atlas of the Jemez ancestral domain, oral histories, recorded testimonials of Jemez elders about the Valles Caldera National Preserve, photo archives, and artifacts repatriated from various museums to put on display at the center. As the DEIS stated, people would be coming from all corners of the world to visit and learn about the Valles Caldera National Preserve. What better way to do this than by displaying these items to educate them about the aboriginal inhabitants of this profoundly unique and beautiful area.

The Valles Caldera National Preserve is a very special place for the Jemez people. There is not a single area in the Preserve that does not include a Jemez Traditional Cultural Property. The entire Caldera is special and we hold it dear to our hearts. We strongly advise that our comments be taken into careful consideration when decisions are being made on the proposed alternatives. Any decision made on the proposed action alternatives would change the Preserve as we know it. Let's all be good stewards of the land as our Jemez forefathers were and work together in good faith to protect and enjoy the Jemez homeland. We look forward to your response.

Sincerely,

Joshua Madalena

Joshua Madalena
Governor

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